

**RICHARDS, LAYTON & FINGER**

A PROFESSIONAL ASSOCIATION

ONE RODNEY SQUARE

P.O. Box 551

WILMINGTON, DELAWARE 19899

(302) 651-7700

FAX (302) 651-7701

WWW.RLF.COM

DIRECT DIAL  
(302) 651-7539  
GAZA@RLF.COM

ANNE SHEA GAZA

January 8, 2007

**BY E-MAIL & HAND DELIVERY**

The Honorable Vincent J. Poppiti  
BLANK ROME LLP  
Chase Manhattan Center  
1201 Market Street, Suite 800  
Wilmington, DE 19801

**Re:** *LG.Philips LCD Co., Ltd. v. ViewSonic Corp., et al.*,  
C.A. No. 04-343-JJF

Dear Special Master Poppiti:

Tatung Company and Tatung Company of America, Inc. (collectively, "Tatung") does not in the ordinary course of business categorize the mounting structures used in their products. Tatung does have knowledge, in most cases, of whether the LCD or PDP devices it uses in its products (which are components that Tatung does not make, but purchases from third parties) have side holes for mounting or front holes for mounting. Tatung can categorize the manner in which LCDs or PDPs are mounted in its products by reference to defined common features.

In most Tatung products the LCD module is mounted to an internal tray or bracket inside the product. The tray or LCD bracket is then connected to the exterior case.

In the California litigation involving the family of patents derived from US Patent No. 5,835,139, LPL asked Tatung to categorize how the LCD was mounted in the tray or brackets which LPL claimed was the "housing." Tatung provided a table to LPL which indicated how the LCD modules are mounted.

There are two obstacles to the categorization process. The first is reaching agreement with LPL on the defined terms; the second is making the categorization. Tatung believes, based on the differences between the plaintiff and defendants in connection with the terms in the

California case and with claims construction in this case, that the first obstacle may be difficult

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to overcome. If agreement can be reached on the definitions, Tatung estimates that the categorization will take 30 days to accomplish.

Respectfully,

*/s/ Anne Shea Gaza*

Anne Shea Gaza  
(#4093)

ASG/afg

cc: Clerk of the Court (By Electronic Filing)  
Richard Kirk, Esquire (via electronic mail)  
Cormac T. Connor, Esquire (via electronic mail)  
Lora Brzezynski, Esquire (via electronic mail)  
Mark Krietzman, Esquire (via electronic mail)  
Scott R. Miller, Esquire (via electronic mail)  
Jeffrey B. Bove, Esquire (via electronic mail)